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 Attorneys for Defendant,
 Sylviane Whitmore

UNITED STATES DISTRICT COURT
 CLARK COUNTY, NEVADA

THE UNITED STATES OF AMERICA,)	CASE NO. 2:17-cr-110-APG-DJA
)	
Plaintiff,)	MOTION FOR LEAVE TO FILE
)	DOCUMENTS UNDER SEAL:
vs.)	
)	Exhibits M and N to Whitmore's
SYLVIANE WHITMORE,)	Restitution Brief
)	
Defendant.)	

COMES NOW Sylviane Whitmore, by and through her counsel, Lisa Rasmussen, Esq., and hereby moves this Court for an order permitting her to file Exhibits M and N to her Restitution Brief (filed at ECF 509) under seal. The basis for this request is as follows:

Exhibit M is Todd Vowell's 2010 tax return and accompanying schedules. **Exhibit N** is his 2012 federal tax return and accompanying schedules. He produced these documents to the government in advance of the May 1, 2024 restitution hearing and the government produced them to the defendants. Ms. Whitmore has referenced them in her Restitution Brief (ECF 509).

While it would be possible to go through each return and redact identifying information including social security numbers, addresses and the like, filing the

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1 documents in that manner would still render information that Mr. Vowell, who is not a
2 party to this case, public in a manner he may prefer they not be made public. To the
3 extent that the government considers Mr. Vowell a “victim” in this case, and out of
4 respect for this third party, it is requested that the Court permit his tax returns to be filed
5 under seal.

6 The undersigned has provided both Exhibits M and N for filing under seal to the
7 government and to counsel for the Co-defendants via manual email transmission on this
8 date in compliance with the Local Rule.

9 For each of these reasons, it is respectfully requested that this Court enter an order
10 permitting Exhibits M and N to Ms. Whitmore’s Restitution Brief to be filed under seal.

11 Respectfully submitted and dated this 15th day of May, 2024.

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13 **The Law Offices of Kristina Wildeveld & Associates,**

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15 */s/ Lisa A. Rasmussen*

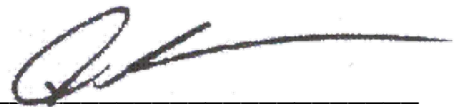
16 LISA A. RASMUSSEN, ESQ.

17 Nevada Bar No. 7491

18 Attorneys for Sylviane Whitmore

19
20 IT IS SO ORDERED:

21 Dated: May 16, 2024

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24 ANDREW P. GORDON
25 UNITED STATES DISTRICT JUDGE
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